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Board of Democracy Prep at the Agassi Campus, Natasha
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PhD, and Kimberly Wall*

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

21 GABRIELLE CLARK, individually and as parent
and guardian of WILLIAM CLARK, and
22 WILLIAM CLARK, individually,

CASE NO.: 2:20-cv-02324-APG-VCF

23 Plaintiffs,

24 vs.

25 STATE PUBLIC CHARTER SCHOOL
AUTHORITY, DEMOCRACY PREP PUBLIC
26 SCHOOLS, DEMOCRACY PREP PUBLIC
SCHOOLS, INC., DEMOCRACY PREP at the
27 AGASSI CAMPUS, DEMOCRACY PREP
NEVADA LLC, SCHOOL BOARD of Democracy
28 Prep at the Agassi Campus, NATASHA TRIVERS,

**STIPULATION TO VACATE
PRELIMINARY INJUNCTION HEARING**

1 individually and in her official capacity as
 2 Superintendent and CEO, ADAM JOHNSON,
 3 individually and in his official capacity as Executive
 4 Director and Principal, KATHRYN BASS,
 5 individually and in her capacity as Teacher,
 JOSEPH MORGAN, individually and in his official
 capacity as Board Chair, KIMBERLY WALL,
 individually and in her capacity as assistant
 superintendent, and John & Jane Does 1-20,

6 Defendants.

7
 8 Plaintiffs Gabrielle Clark and William Clark, by and through their counsel of record MARQUIS
 9 AURBACH COFFING, and Defendants Democracy Prep Public Schools, Democracy Prep Public
 10 Schools, Inc., Democracy Prep at the Agassi Campus, Democracy Prep Nevada LLC, School Board of
 11 Democracy Prep at the Agassi Campus, Natasha Trivers, Adam Johnson, Kathryn Bass, Joseph Morgan,
 12 PhD, and Kimberly Wall (the “Democracy Prep Defendants”), by and through their counsel,
 13 GREENBERG TRAURIG, LLP, and WILMER CUTLER PICKERING HALE AND DORR LLP,
 hereby request that the Court vacate the upcoming preliminary injunction hearing.

14
 15 The parties state as follows:

16 1. On April 9, 2021, Defendants notified Plaintiffs and the Court that “Defendants have
 17 expunged William Clark’s first and second trimester Sociology of Change grades and updated his
 18 transcript to reflect the same.” ECF 93 & ECF 93-1 (Ltr. From A. Johnson to W. Clark). “Defendants
 19 have also excused William from completing the Sociology of Change course as a graduation
 20 requirement, such that he will remain on track to graduate in May 2021 with the rest of his senior cohort
 21 so long as he otherwise remains in good academic standing and fulfills all other graduation
 22 requirements.” ECF 93 & ECF 93-1 (Ltr. From A. Johnson to W. Clark).

23 2. In light of this intervening development, the parties stipulate that Defendants have
 provided Plaintiff William Clark with the preliminary injunctive relief he seeks.

24 3. Accordingly, the parties stipulate that the status conference and preliminary injunction
 hearing scheduled for April 12 and 14, 2021 be vacated.

25 4. The parties further stipulate that all pending discovery obligations directed toward the
 hearing, including depositions, be vacated.

1 5. The parties further stipulate that the pending motion for a preliminary injunction is
2 withdrawn.

3 **IT IS SO STIPULATED.**

4 DATED this 9th day of April, 2021.

5 **GREENBERG TRAURIG, LLP**

6 _____
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28 Democracy Prep Nevada LLC, School Board of
29 Democracy Prep at the Agassi Campus, Natasha
30 Trivers, Adam Johnson, Kathryn Bass, Joseph
31 Morgan, PhD, and Kimberly Wall*

5 **MARQUIS AURBACH COFFING**

6 _____
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15 **STATE PUBLIC CHARTER SCHOOL
16 AUTHORITY**

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23 *Attorney for State Public Charter School
24 Authority*

25 **ORDER**

26 In consideration of the stipulation by the parties, and with cause appearing:

27 IT IS HEREBY ORDERED that any hearings currently scheduled shall be vacated;

28 IT IS HEREBY ORDERED that any pending discovery deadlines directed toward the hearing
29 shall be vacated;

30 IT IS FURTHER ORDERED that the pending motion for a preliminary injunction is withdrawn.

31 IT IS SO ORDERED.

32 DATED this _____ day of April, 2021.

33 **UNITED STATES DISTRICT JUDGE**